

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>RAS Crane, LLC</b> 10700 Abbott's Bridge Road, Suite 170 Duluth, GA 30097 Telephone Number 470-321-7112 Attorneys For Secured Creditor  Harold Kaplan, Esq. (HK-0226)	CASE NO.: 18-28986-ABA  CHAPTER 13  <b>Objection to Confirmation of Debtor's Chapter 13 Plan</b>
<b>In Re: Grant G. Cameron, Debtor.</b>	

**OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

NATIONSTAR MORTGAGE LLC ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE # 3), and states as follows:

1. Debtor, Grant G. Cameron ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on September 25, 2018.
2. Secured Creditor holds a security interest in the Debtor's real property located at 63-65 EAST AVE, BRIDGETON, NJ 08302, by virtue of a Mortgage recorded on August 27, 2002 in Book 2860, at Page 208 of the Public Records of Cumberland County, NJ. Said Mortgage secures a Note in the amount of \$51,000.00.
3. The Debtor filed a chapter 13 plan on September 25, 2018.
4. The plan proposes to cure Secured Creditors claim through short sale of the real property. Thus far, short sale of property has not been approved. In addition, the plan fails to provide for monthly adequate protection payments to be made pending property sale. Secured creditor objects to any plan that proposes to sale the real property and fails to acknowledge and amount for monthly payments during the pendency of the sale.
5. The Plan does not appear feasible due to inadequate treatment of Secured Creditor's claim. Thus, the plan violates the provisions of 11 U.S.C. § 1325(a)(3) and cannot be confirmed.

**WHEREFORE**, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

RAS Crane, LLC  
Attorney for Secured Creditor  
10700 Abbott's Bridge Road, Suite 170  
Duluth, GA 30097  
Telephone Number 470-321-7112

By: /s/Harold Kaplan  
Harold Kaplan, Esquire  
NJ Bar Number HK-0226  
Email: hkaplan@rasnj.com

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**CERTIFICATION OF SERVICE**

1. I, Harold Kaplan, represent NATIONSTAR MORTGAGE LLC in this matter.
2. On 10/16/2018, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

10/16/2018

RAS Crane, LLC  
Attorney for Secured Creditor  
10700 Abbott's Bridge Road, Suite 170  
Duluth, GA 30097  
Telephone Number 470-321-7112

By: /s/Harold Kaplan  
Harold Kaplan, Esquire  
NJ Bar Number HK-0226  
Email: hkaplan@rasnj.com

<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
Seymour Wasserstrum Law Offices of Seymour Wasserstrum 205 West Landis Avenue Vineland, NJ 08360	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  (as authorized by the court*)
Grant G. Cameron 63-65 East Ave Bridgeton, NJ 08302	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  (as authorized by the court*)
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  (as authorized by the court*)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  (as authorized by the court*)